



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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of the California High Cost Fund B Program

Rulemaking 06-06-028

**PROGRESS REPORT ON REVERSE AUCTIONS OF WORKING GROUP 1
IN RESPONSE TO ASSIGNED COMMISSIONER'S RULINGS
DATED DECEMBER 13, 2007 AND JANUARY 7, 2008**

February 21, 2008

Reverse Auctions – Working Group 1

Progress Report – February 21, 2008

INTRODUCTION

The Assigned Commissioner's Rulings dated December 13, 2007, (the "December ACR") and January 7, 2008, (the "January ACR") established working groups as part of the overall effort to design and implement reverse auctions to select a carrier/carriers of last resort (COLR)¹ and to set the necessary levels of support in high-cost areas. Working Group 1 ("WG1") was established to address issues including the definition of basic service, and what specific eligibility criteria and service quality commitments should be required as a basis to participate in reverse auction bidding.²

As described in the January ACR, WG1 includes representatives from AT&T, Comcast, Cox, DRA, Frontier, Small LECs, Sprint Nextel, T-Mobile, TURN, and Verizon. The work of the group is coordinated by Communications Division staff. Michael Foreman of AT&T has acted as leader of WG1.

Since its inception, WG1 has held weekly conference calls in an attempt to address the questions presented in the December ACR. In organizing its work, WG1 addressed certain critical tasks which were deemed prerequisite to developing responses to the individual questions. The group discussed goals, the goals of CHCF-B as well as the goals of WG1, identified key, threshold issues and developed positions on an initial set of threshold issues. This Progress Report endeavors to summarize these discussions to-date and to present preliminary positions on the initial set of threshold issues. As such, the Report does not attempt to address the individual questions raised in the December ACR, but rather seeks to identify areas of consensus and alternative views on the critical issues underlying these questions. Therefore, topics in this Progress Report include:

- Goals
- Identification of Threshold Issues
- Discussions of Initial Threshold Issues
 - Services to be included within the reverse auction bid
 - Service Quality
 - If an existing ILEC COLR does not submit a selected bid during the auction, should there be requirements that the ILEC make its existing facilities in the designated area available to a new COLR?

¹ WG1 has not discussed the questions of whether there should be more than one "winner" of the auction or whether a carrier need be a COLR to receive funds. These are matters that are being addressed by WG2.

² Initially, the December ACR established a third, separate working group to address geographic areas. The January ACR modified the working group structure and these issues were assigned to WG1.

The tasks assigned to WG1, reverse auction structure and bidding protocols, are complex issues. The discussions held to-date have been very successful – characterized by the free exchange of ideas, the open sharing of information, and a disciplined willingness to explore many sides of an issue. The complexity of the issues, combined with the critical importance of the outcomes of the auctions, have driven the group to proceed deliberately, recognizing the need to thoroughly perform the task it has been assigned. The importance and complexity of the issues are such that the group has not yet completed its consideration of all of the threshold issues. We anticipate providing a second progress report on or about April 1, 2008. Additionally, the group has gained a great appreciation for the fact that many of the most important design issues are interdependent, and also depend on decisions which will be made by the Commission in other dockets. Therefore, WG1 expects that it will be necessary for the Commission to resolve one or more significant policy issues which are pending in other dockets, including its service quality rules and the Lifeline program revision, so that parties can move forward in a collaborative effort to complete the optimal, final auction design. It is important to recognize that this Progress Report does not capture all parties' comments in full. Again, these are complex issues which will necessarily require sophisticated solutions. The members of WG1 encourage the Commission to seek further comment on specific proposals to develop a more complete record upon which to make these important decisions.

GOALS

WG1 opened its efforts with a discussion of (1) the overarching goals of CHCF-B and (2) the goals for the working groups. There was general consensus that the goal of CHCF-B was to promote the Commission's universal service goals by providing Californians in high cost areas with access to high-quality, affordable telecommunications and that the goal of reverse auctions is to provide for that service in the most efficient manner – minimizing the public subsidy.

Regarding the goals of the group, there was general consensus that our task was to determine parameters of acceptable COLR service consistent with the Commission's universal service policies and service standards, and to do this in a technologically neutral way. There was a general consensus among group members that the reverse auctions would not be viewed as having a successful outcome unless these alternative technologies are included in the mix. Some team members also expressed a strong overriding concern that there be no diminution of basic service elements, service quality or basic service affordability as a result of the revised definition of basic service for purposes of the reverse auctions as result of including alternative technologies in the auction.

IDENTIFICATION OF THRESHOLD ISSUES

In order to respond to the questions presented to the group in the most efficient manner, WG1 identified a list of critical over-arching “threshold” issues which needed to be addressed first.

A general consensus was reached that the following items be treated as threshold issues:

1) Services to be included within the reverse auction bid

- a) How the definition of basic services required to be offered by the COLR should be revised so as to provide for wireline, wireless and other nontraditional voice carriers to qualify as bidders for COLR status in the reverse auction.
- b) What minimum service(s) and attributes should be included within the bid covered by the reverse auction?
- c) What limitations or conditions should be placed on service(s) that may be included within (or excluded from) the evaluation of the bid.

2) Service Quality, Reliability, and Pricing Commitments

- a) What service quality, pricing, and reliability standards and commitments should be placed on winning bidders as a condition of serving as COLR? For example, what minimum standard of reliable 911 service should be required to qualify as a COLR as a result of a reverse auction bid?
- b) Should the bid include commitments concerning the maximum level of retail prices to be charged?
- c) What threshold financial fitness standards should be required to demonstrate the ability to serve as a COLR on an ongoing basis at the appropriate level of service quality, reliability and security?
- d) Under what circumstances should there be a bond required to qualify as COLR?

3) Term of the COLR Contract for a Winning Bidder

- a) Should COLR status be granted to a winning bidder for only a set time subject to periodic renewal?
- b) If so, what should be the duration of COLR status?
- c) What criteria should determine whether renewal should be granted?

4) Transition Process for New COLRs

- a) If an existing ILEC COLR does not submit a selected bid during the auction, should there be requirements that the ILEC make its existing facilities in the designated area available to a new COLR?
- b) To the extent such an approach was followed, through what process would the ILEC receive fair compensation for the use of such facilities?

Other remaining issues assigned to WG1 in the December ACR were determined to be secondary issues. WG1 has so far discussed, at least to some degree, Threshold Issues 1, 2, and 4 above. See Attachment 1 of this progress report for a full listing and classification of WG1 issues and questions.

DISCUSSION OF INITIAL THRESHOLD ISSUES

Services to Be Included Within the Reverse Auction Bid

Generally, the parties recognize that it is critical that the Commission clearly define all of the requirements for participating in the auction, and the obligations that the winning bidder will assume, with specificity, before the auction begins. All bidders must have a clear understanding going in about just what they are bidding to obtain and what they will be committing to do in exchange for the high-cost support, so that they can formulate their bids based on the same set of information and criteria.

For these reasons, a majority of participants believed this issue to be the most important item that would be considered by WG1. In particular, considerable deliberation has been devoted to the definition and components of “basic service” that would be provided by winning bidders. WG1 participants recognize that this issue is particularly difficult because, CHCF-B has historically been based on a landline basic service model and in some cases “apples to apples” comparisons between the services made available through different technologies are not possible or are complicated because providers have disparate business plans.

WG1 has not yet reached consensus, and may ultimately not reach consensus, on all of the possible elements of basic service; however consensus was reached on a great many of these.

FCC Definition of Basic Service

The group first considered the FCC’s nine supported services for federal universal service purposes outlined in 47 C.F.R. § 54.101, a copy of which is attached (Attachment 2).

The services or functionalities that are supported by Federal universal service support mechanisms, as identified in 47 C.F.R. § 54.101(a) are:

- 1) voice-grade access to the public switched telephone network;
- 2) local usage;
- 3) dual tone multi-frequency signaling or its functional equivalent;
- 4) single-party service or its functional equivalent;
- 5) access to emergency services;
- 6) access to operator services;
- 7) access to long distance services;
- 8) access to directory assistance; and
- 9) toll limitation for qualifying low-income consumers.

There was general agreement that the FCC functionalities represent a good starting point for the group's consideration of basic service elements, because it appeared to be less "wireline centric" than the CPUC's current basic service definition in D.96-10-066. There was also a general consensus among working group members that, at a minimum, all of the FCC's nine supported services, as defined by the FCC, should be included in the California definition of "basic service" to be provided by any COLR selected through a reverse auction. It was acknowledged that element 9, toll limitation, applies only in the event customers with low incomes are potentially subject to toll charges.

Some members of the working group believed that the FCC elements were adequate as a working definition of basic service; other members were concerned that important elements of basic service might be lost if WG1 failed to deliberate on the existing basic service elements delineated in D. 96-10-066. The group therefore discussed the desirability and feasibility of retaining the CPUC's existing 17 basic service elements in the inter-modal COLR reverse auction envisioned by the Commission.

CPUC's Current Definition of Basic Service

The services or functionalities that are currently supported by CPUC universal service support mechanisms, as identified in D.96-10-066 are:

- 1) access to single party local exchange service;
- 2) access to all interexchange carriers offering service to customers in a local exchange;
- 3) ability to place calls;
- 4) ability to receive free unlimited incoming calls;
- 5) free touch tone dialing;
- 6) free and unlimited access to 911/E911;
- 7) access to local directory assistance and access to foreign NPAs;
- 8) Lifeline rates and charges for eligible customers;
- 9) customer choice of flat or measured rate service;
- 10) free provision of one directory listing per year as provided for in D.96 02 072;
- 11) free white pages telephone directory;
- 12) access to operator services;
- 13) voice grade connection to public switched telephone network;
- 14) free access to 800 or 800 like toll free services;
- 15) one time free blocking for information services and one time billing adjustments for charges incurred inadvertently, mistakenly, or that were unauthorized;
- 16) access to telephone relay service as provided for in PU Code 2881; and
- 17) free access to customer service for information about ULTS, service activation, service termination, service repair and bill inquiries.

Each of the elements is discussed below.

1) Access to Single Party Local Exchange Service

The parties generally agreed that the functionality of single party calling should be provided.

2) Access to All Interexchange Carriers Offering Service to Customers in a Local Exchange

The parties generally agreed that any COLR selected through an auction should provide the functionality of access to all interexchange carriers but disagreed as to the manner in which that functionality must be provided.

Some parties noted that wireless and VoIP service providers do not have “equal access” legal obligations, unlike traditional wireline carriers; often have calling plans and network designs that do not necessarily distinguish between local, intrastate toll, or interstate toll calling; may not have networks currently capable of providing equal access to interexchange carriers; and therefore, may be less likely to participate in reverse auctions if an equal access requirement is included as a necessary element of basic service to be provided by the winning bidder. These parties noted that users may access their interexchange carrier of choice via 8YY dialing, which is available through providers of all technologies.

Other parties expressed concerns that requiring users to access their interexchange carrier of choice via 8YY dialing would represent an undesirable diminution of the service customers currently receive from existing basic service providers. These parties also expressed concerns that requiring customers to access their interexchange carrier via 8YY dialing could result in higher toll charges for such customers, as most wireless plans use airtime minutes when 8YY numbers are called. Other parties noted that some of the lowest long-distance calling rates are available through calling cards. Another concern was that applying two different access standards could favor one group of bidders.

3) Ability to Place Calls

The parties all agreed this functionality should be provided by any COLR selected through a reverse auction.

4) Ability to Receive Free Unlimited Incoming Calls

The parties agreed that users should have the ability to receive incoming calls, but disagreed on whether they should be “free”.

Some working group members noted that many wireless and some VoIP providers have calling plans with specified minutes of usage for a specified monthly rate. Because incoming calls generally count against the user's bucket of included minutes, and because the user would incur additional usage charges for incoming calls beyond the user's specified minutes, incoming minutes under such plans would not likely be considered "unlimited" or "free". These working group members noted, among other things, that because such a requirement is inconsistent with such providers' current business models, such a requirement could discourage such providers' participation in the auctions. These members recommend that this existing basic service element be either modified or eliminated so that it is consistent with the goal of developing technology neutral definitions.

Other members believe that customers in California have come to expect free unlimited incoming calls as part of their basic service, the loss of which would be an unacceptable diminution of basic service.

5) Free Touch Tone Dialing

A majority of working group members believe that this requirement is an obsolete hold-over from regulation of the 1980s and should be eliminated. Some working group members prefer to maintain this requirement to ensure that customers are not charged separately for Touch Tone dialing.

6) Free and Unlimited Access to 911/E911

The parties agree that any COLR selected through a reverse auction should provide free and unlimited access to 911, and where available, E911.

Some members emphasized that it is especially important that customers not experience a diminution in service for their emergency communications and that bidders should be required to have network capabilities that fully enable the technologies deployed by the local public safety organizations in that carriers' serving territory.

7) Access to Local Directory Assistance and Access to Foreign NPAs

The parties observed that "access to foreign NPAs" was intended to refer to access to directory assistance in areas outside the caller's local calling area via NXX-555-1212 dialing. The parties agreed that access to some level of directory assistance is an appropriate element of basic service and that any COLR selected through an auction should provide.

8) Lifeline Rates and Charges for Eligible Customers

In principle, all WG1 parties agree that any COLR selected through a reverse auction should be able to provide discounted Lifeline service to qualifying customers. However, under the current California Lifeline program, neither wireless nor certain VoIP providers are eligible to participate. The parties observe that the Commission is considering modifying the Lifeline program in R.06-05-028, and that any such changes should be addressed in that docket and not in this proceeding. Certain parties' support of this element as part of basic service is contingent on modifications to the current Lifeline program to allow for participation on a technologically neutral basis.

9) Customer Choice of Flat or Measured Rate Service

The parties have not reached consensus on this item for reasons similar to those expressed regarding Item 4 above. Some working group members noted that many wireless providers and some VoIP providers have calling plans with a specified number of minutes of use for a specified monthly rate. Because such providers charge additional usage charges for additional minutes of use, such calling plans would not provide the equivalent "flat rate". These working group members noted that because a flat rate requirement is inconsistent with these providers' existing business models, such providers could be discouraged from participating in the auctions. These parties generally recommend that the Commission not impose a flat rate requirement upon any COLR selected through an auction and that it consider technologically neutral alternatives to this requirement.

Other members believe that customers in California have come to expect a choice of flat or measured service as part of their basic service, the loss of which would be an unacceptable diminution of service.

10) Free provision of one directory listing per year as provided for in D.96 02 072

It may be problematic for some providers to ensure that their customers are listed in a directory. For example, wireless providers do not publish the telephone numbers of their customers. Additionally, providers that do not own directory publishing companies may find it difficult to ensure that their customers are listed. Some working group members were concerned that absent this requirement, small rural businesses might not be guaranteed a directory listing. No consensus has been reached. Work on this item continues.

11) Free White Pages Telephone Directory

Some providers that do not own directory publishing companies may be

disadvantaged by this requirement. Some members believe that this requirement can be fulfilled through commercial agreements, where necessary.

12) Access to Operator Services

The parties agreed that the winning bidder(s) must provide this functionality.

13) Voice Grade Connection to Public Switched Telephone Network

The parties agreed that the winning bidder(s) must provide this functionality.

14) Free Access to 800 or 800 Like Toll Free Services

The parties agree that the winning bidder(s) must provide access to 8YY services, but disagree regarding whether such access must be “free” for reasons similar to those discussed regarding Item 4 above.

Some working group members noted that many wireless and some VoIP providers have calling plans with specified minutes of usage for a specified monthly rate. Because calls to 8YY numbers would count against the user’s bucket of included minutes, and because the user would incur additional usage charges for 8YY calls above the user’s specified minutes, such access would likely not be considered “free”. These working group members noted that because such a requirement is inconsistent with such providers’ current business models, such a requirement could discourage such providers’ participation in the auctions. These members recommend that this existing basic service element be modified or eliminated to make it technologically neutral.

Other members believe that customers in California have come to expect free access to 800 or 800-like toll-free services as part of their basic service, the loss of which would be an unacceptable diminution of service.

15) One Time Free Blocking for Information Services and One Time Billing Adjustments for Charges Incurred Inadvertently, Mistakenly, or That Were Unauthorized

This requirement was originally intended to protect consumers from incurring inadvertent or unauthorized charges and/or 976 calls. Several group members argued that this requirement (either in whole or in part) may no longer necessary or accurate because of consumer protections that were adopted by the Commission and by state law after the basic service definitions were adopted by the Commission in D.99-10-066. A majority of group members agreed with this view. It was also noted that many wireless and VoIP providers routinely block access to 976 numbers.

Even though there is statutory protection from unauthorized charges, some members expressed concern about charges inadvertently incurred through other pay-per-use features or protracted disputes between a customer and carrier regarding what is considered to be “unauthorized” and, therefore, believed that this general concept is still relevant.

16) Access to Telephone Relay Service as Provided for in PU Code 2881

Although the parties generally support this element, WG1 is reviewing current Commission requirements to make sure that no industry segment would be inadvertently excluded from participation in the auction under the status quo.

Some parties believe that access to Telephone Relay Service must continue to be available and that winning bidders must be capable of supporting telecommunications devices that serve the needs of the deaf or hearing impaired.

17) Free Access to Customer Service for Information About ULTS, Service Activation, Service Termination, Service Repair and Bill Inquiries.

All providers in WG1 provide free access to customer service. The parties generally agreed that free access to customer service for information about ULTS, service activation, service termination, service repair and bill inquiries should be a functionality any auction winner should be required to provide. However, as discussed above, support of this element by some parties with respect to ULTS is conditioned on the ULTS program being modified to include wireless carriers and all VoIP providers.

Service Quality, Reliability, and Pricing Commitments

In the time allotted, WG1 was only able to briefly touch on the issue of service quality. There was a general consensus that any attempt to have WG1 fashion a separate unique set of service quality standards for COLRs selected through reverse auctions, but not applicable to any (non-auctioned) other COLRs, would be ill-advised. The Commission already has an open proceeding in R.02-12-004 and is carefully deliberating a host of issues raised in that proceeding. It would make little sense for WG1 to attempt to reinvent the wheel and develop additional, and potentially redundant or contradictory, service quality standards for auction COLRs given the considerable work that is already being devoted to this matter. Some parties believe that the scope of R.02-12-004 would have to be modified to include service quality standards unique to COLR obligations. These issues should be settled before auctions begin so that bidders can make fully informed bids.

If an Existing ILEC COLR Does Not Submit a Selected Bid During the Auction, Should There Be Requirements That the ILEC Make Its Existing Facilities in the Designated Area Available to a New COLR?

WG1 has, so far, had only a preliminary discussion of this question. Some parties have conducted a legal analysis of this question and concluded that ILEC obligations to allow access to their facilities are governed by federal law (e.g., 47 USC §§ 251-261) and that any California requirements inconsistent with these statutes would be preempted.

Other parties are conducting research on this issue that will be presented in future meetings.

At least one party expressed concern that changes in existing traffic exchange, interconnection and access obligations among carriers that occur after the auction but during the designated COLR period can impact the economics of providing service as a COLR.

Attachment 1 R.06-06-028 _ Reverse Auction ACR Issues Matrix

Issue Categories	Working Group 1 12/13/07 ACR Questions -- Service Provider Eligibility Requirements
WG1 a) Services to be included within the reverse auction bid THRESHOLD	a1) How the definition of basic services required to be offered by the COLR should be revised so as to provide for wireline, wireless and other nontraditional voice carriers to qualify as bidders for COLR status in the reverse auction. a2) What minimum service(s) and attributes should be included within the bid covered by the reverse auction? a3) What limitations or conditions should be placed on service(s) that may be included within (or excluded from) the evaluation of the bid.
WG1 b) Service Quality, Reliability, and Pricing Commitments THRESHOLD	b1) What service quality, pricing, and reliability standards and commitments should be placed on winning bidders as a condition of serving as COLR? For example, what minimum standard of reliable 911 service should be required to qualify as a COLR as a result of a reverse auction bid? b2) Should the bid include commitments concerning the maximum level of retail prices to be charged? b3) What threshold financial fitness standards should be required to demonstrate the ability to serve as a COLR on an ongoing basis at the appropriate level of service quality, reliability and security? b4) Under what circumstances should there be a bond required to qualify as COLR?
WG1 c) Audit and Verification Requirements SECONDARY	c1) What Commission audit and/or verification requirements may be warranted to confirm that a winning bidder follows through with commitments to meet specified minimum basic service quality and reliability standards and retail rate levels for basic service? c2) What, if any, penalties should be imposed for withdrawal, such as the difference between the winning bid amount and the next carrier or re-auction bid amount? c3) What factors should the Commission consider in determining such a penalty?
WG1 d) Term of the COLR Contract for a Winning Bidder THRESHOLD	d1) Should COLR status be granted to a winning bidder for only a set time subject to periodic renewal? d2) If so, what should be the duration of COLR status? d3) What criteria should determine whether renewal should be granted?
WG1 e) Transition Process for New COLRs SECONDARY	e1) Assuming that a new COLR is selected for a particular area based on a winning bid, what is an appropriate transition period to phase-out an existing COLR's support and phase-in the new COLR's support? e2) Should the same timeframe be used to phase-in coverage and other COLR obligations? e3) Should build-out benchmarks be established? How should such build-out benchmarks be enforced? e4) If an existing ILEC COLR does not submit a selected bid during the auction, should there be requirements that the ILEC make its existing facilities in the designated area available to a new COLR? THRESHOLD e5) To the extent such an approach was followed, through what process would the ILEC receive fair compensation for the use of such facilities? THRESHOLD



47 C.F.R. § 54.101

Effective: [See Text Amendments]

Code of Federal Regulations Currentness

Title 47. Telecommunication

Chapter I. Federal Communications
Commission (Refs & Annos)

Subchapter B. Common Carrier Services

Part 54. Universal Service (Refs & Annos)

Subpart B. Services Designated for Support

→§ 54.101 Supported services for rural, insular and high cost areas.

(a) Services designated for support. The following services or functionalities shall be supported by federal universal service support mechanisms:

(1) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signalling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;

(2) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users;

(3) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;

(4) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to

have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;

(5) Access to emergency services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911," to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;

(6) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;

(7) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;

(8) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to,

47 C.F.R. § 54.101

making available to customers, upon request, information contained in directory listings; and

(9) Toll limitation for qualifying low-income consumers. Toll limitation for qualifying low-income consumers is described in subpart E of this part.

(b) Requirement to offer all designated services. An eligible telecommunications carrier must offer each of the services set forth in paragraph (a) of this section in order to receive federal universal service support.

(c) Additional time to complete network upgrades. A state commission may grant the petition of a telecommunications carrier that is otherwise eligible to receive universal service support under § 54.201 requesting additional time to complete the network upgrades needed to provide single-party service, access to enhanced 911 service, or toll limitation. If such petition is granted, the otherwise eligible telecommunications carrier will be permitted to receive universal service support for the duration of the period designated by the state commission. State commissions should grant such a request only upon a finding that exceptional circumstances prevent an otherwise eligible telecommunications carrier from providing single-party service, access to enhanced 911 service, or toll limitation. The period should extend only as long as the relevant state commission finds that exceptional circumstances exist and should not extend beyond the time that the state commission deems necessary for that eligible telecommunications carrier to complete network upgrades. An otherwise eligible telecommunications carrier that is incapable of offering one or more of these three specific universal services must demonstrate to the state commission that exceptional circumstances exist with respect to each service for which the carrier desires a grant of additional time to complete network upgrades.

[63 FR 2125, Jan. 13, 1998; 63 FR 33585, June 19, 1998]

SOURCE: 62 FR 32948, June 17, 1997; 72 FR 46920, Aug. 22, 2007, unless otherwise noted.

AUTHORITY: 47 U.S.C. 151, 154(i), 201, 205, 214, and 254 unless otherwise noted.

47 C. F. R. § 54.101, 47 CFR § 54.101

Current through February 14, 2008; 73 FR 8785

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **PROGRESS REPORT ON REVERSE AUCTIONS OF WORKING GROUP 1 IN RESPONSE TO ASSIGNED COMMISSIONER'S RULINGS DATED DECEMBER 13, 2007 AND JANUARY 7, 2008** on all persons on the official service List in **R.06-06-028**, via e-mail, hand-delivery and/or first-class U.S. Mail.

Dated this 21st day of February 2008 at San Francisco, California.

AT&T
525 Market Street, 20th Floor
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/s/
Thomas J. Selhorst

CALIFORNIA PUBLIC UTILITIES COMMISSION

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